

AB:ANR
F. #2022R00203

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. §§ 371 and 1708)

ALI TUNKARA,

23-MJ-56

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

LOUIS MAIOCCO, being duly sworn, deposes and states that he is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

CONSPIRACY TO COMMIT MAIL THEFT

In or about and between November 2022 to December 2022, within the Eastern District of New York and elsewhere, the defendant ALI TUNKARA, together with others, did knowingly and willfully conspire to commit an offense against the United States, to wit: mail theft, in violation of Title 18, United States Code, Section 1708.

(Title 18, United States Code, Section 371)

THEFT OR RECEIPT OF STOLEN MAIL

In or about and between November 2022 to December 2022, within the Eastern District of New York and elsewhere, the defendant ALI TUNKARA did knowingly and intentionally buy, receive, conceal and unlawfully had in his possession one or more letters, postal cards, packages, bags, and mail, and one or more articles and things therein, to wit: checks

that had been conveyed to a U.S. Postal Station for delivery via U.S. mail, which had been stolen, taken, embezzled and abstracted from or out of any mail, post office, or station thereof, letter box, mail receptacle, mail route, authorized depository for mail matter or from a mail carrier.

(Title 18, United States Code, Section 1708)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a United States Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been since May 2019. I have been involved in the investigation of numerous cases involving mail theft. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including criminal history records; and from reports of other law enforcement officers involved in this investigation. Over the course of this mail theft investigation, I also routinely reviewed cellular devices and accompanying records. The USPIS is a federal agency charged with investigating violations of criminal and civil statutes relating to the United States Postal Service ("USPS"). I am currently assigned to the Brooklyn External Crimes Team.

2. I have received training and assisted in cases involving financial crimes, computer crimes, communications-related crimes, identity theft and money laundering. I have also received training in areas of mail fraud, mail theft, credit card fraud and threats or assaults made against USPS employees. I have received formal instruction from United States Postal

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Inspectors, and other federal, state, and local law enforcement agents who have done extensive work in investigating criminal and civil misconduct.

3. Since approximately November 2022, USPIS in New York has been working with USPIS in Ohio to investigate the mailing of checks to New York from robbery suspects in Ohio in connection with a series of robberies of Ohio United States postal employees for arrow keys, which are keys used by United States Postal Service employees to open Postal Service mail receptacles.

4. In November 2022, a USPIS postal inspector from Ohio (“Ohio Postal Inspector”) contacted me with respect to defendant ALI TUNKARA. The Ohio Postal Inspector had recovered a package (“Ohio Package 1”) that he identified that was destined to TUNKARA’s address (the “Tunkara Residence”) and addressed to him.

5. On November 16, 2022, ALI TUNKARA called the United States Postal Service on a recorded phone call inquiring as to the status of Ohio Package 1.

6. Based on evidence in his investigation of local robberies of United States postal employees, including finding a receipt for previous packages sent to TUNKARA in the vehicle of a robbery suspect, the Ohio Postal Inspector sought and received authorization for a search warrant (the “Ohio Search Warrant”) for Ohio Package 1.

7. When executing the Ohio Search Warrant, the Ohio Postal Inspector opened Ohio Package 1, which contained approximately 78 checks both business and personal checks in different individuals’ names; none of the checks belonged to TUNKARA.

8. Based on my investigation with the Ohio Postal Inspector, I began to monitor the mail to the Tunkara Residence. In my review of ALI TUNKARA’s mail activity, I noticed approximately 20 packages being sent from Columbus, Ohio to the Tunkara Residence.

These packages all shared the same profile of Ohio Package 1 in terms of the method of shipping and the weight of the packages.

9. On December 27, 2022, I was notified of a package ("Ohio Package 2") that was sent to ALI TUNKARA from Columbus, Ohio. Surveillance from the purchase of that Priority Mail label showed the robbery suspect from Ohio completing the mailing to the Tunkara Residence. The sender of Ohio Package 2 was the same sender as Ohio Package 1 and the recipient was listed as TUNKARA's address with a fictitious name, "Joseph Liam." I know this to be a fictitious name because, based on my records check of the Tunkara Residence, no such person is affiliated in any way with that address. On December 29, 2022, postal inspectors intercepted Ohio Package 2. Ohio Package 2 is of the same weight as prior packages received by TUNKARA at the Tunkara Residence.

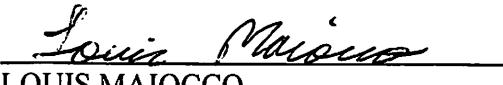
10. On January 17, 2023 I obtained a search warrant from the Honorable James R. Cho, Magistrate Judge for the Eastern District of New York to search Ohio Package 2, 23-MJ-50. In executing that search warrant, I opened Ohio Package 2, which contained approximately 24 personal checks in different individuals' names with the approximate total value of \$26,645, with none of the checks belonging to ALI TUNKARA.

11. In addition, based on my review of financial records associated with ALI TUNKARA, I reviewed bank documents from Discover indicating account takeovers of six victims and in these accounts there were deposits of checks from the Ohio area in names that did not reflect the account holder's names or TUNKARA's name. Across these accounts there were Zelle transactions from the various account holders to TUNKARA, and at least 13 payments to TUNKARA of \$600. My review of these financial records also uncovered purchases using the

victims' debit cards at various postal offices in New York of United States postal money orders totaling approximately \$26,320 which listed TUNKARA as the payor or payee.

12. On January 18, 2023, a premises search warrant was executed at the Tunkara Residence. Law enforcement officers found over 100 personal and business checks, over 50 bank cards, and 10 pieces of mail none in ALI TUNKARA's name in his room at the Tunkara Residence. Officers also found United States Postal Service Express Mail labels from packages sent from Ohio and an entire box of check stock in TUNKARA's room. Officers also found brake fluid and other household chemicals that based on my training and experience I know are commonly used to remove ink from checks.

WHEREFORE, your deponent respectfully requests that the defendant ALI TUNKARA, be dealt with according to law.


LOUIS MAIOCCO
Postal Inspector, United States Postal Inspection Service

Sworn to before me this
18th day of January, 2023


THE HONORABLE JAMES R. CHO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK